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## MEMORANDUM ENDORSED

August 11, 2023

**Via CM/ECF**

The Honorable Gabriel W. Gorenstein  
 U.S. District Court for the Southern District of New York  
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 New York, NY 10007

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Re: *Donna Wood, et al. v. Mike Bloomberg 2020, Inc.*, No. 20 Civ. 2489 (LTS) (GWG)

Dear Judge Gorenstein:

We represent Defendant Mike Bloomberg 2020, Inc. (the “Campaign”) in the above-referenced matter. Pursuant to Rule 1.E of this Court’s Individual Practices, the Campaign respectfully requests a three-week extension of the deadline for Rebuttal Expert Reports from September 27, 2023 to October 18, 2023. Plaintiffs consent to this request.

The Campaign makes this request for additional time because of the pre-existing professional commitments and availability constraints of its anticipated expert in August and early September. Additionally, there were certain documents that Plaintiffs’ expert reviewed that had not been produced during fact discovery and that were not provided to the Campaign until August 4, 2023, which was three weeks after Plaintiffs had produced their expert’s report.<sup>1</sup> This intervening time period further supports the Campaign’s request for a three-week extension of the deadline for Rebuttal Expert Reports.

This is the Campaign’s second request for an extension of this deadline.

For all of the foregoing reasons, the Campaign respectfully requests that the Court grant its request for an extension and adopt the following proposed schedule, which sets forth a three-week extension of the deadline for Rebuttal Expert Reports, as well as a corresponding extension of the other remaining deadlines.

| Event                                | Current Deadline | Deadline with Extension |
|--------------------------------------|------------------|-------------------------|
| Deadline for Rebuttal Expert Reports | Sept. 27, 2023   | Oct. 18, 2023           |
| Deadline for Reply Expert Reports    | Oct. 30, 2023    | Nov. 20, 2023           |
| Deadline for Expert Depositions      | Nov. 13, 2023    | Dec. 4, 2023            |

<sup>1</sup> Plaintiffs produced their expert’s report on July 14, 2023, which was the deadline for their expert report and disclosures.



|  |               |              |
|--|---------------|--------------|
| Deadline for Letter re Intent to File Summary Judgment Motion <sup>2</sup> | Nov. 13, 2023 | Dec. 4, 2023 |
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The Campaign thanks the Court for its attention to this matter.

Respectfully submitted,

*/s/ Elise M. Bloom*

Elise M. Bloom

cc: All Counsel of Record (via CM/ECF)

The proposed schedule is approved.

So Ordered.

  
GABRIEL W. CORENSTEIN  
United States Magistrate Judge

August 11, 2023

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<sup>2</sup> During a July 21, 2023 meet and confer, Plaintiffs' counsel proposed seeking a modification of this deadline so that that any letter indicating intent to file a summary judgment motion would be due three weeks after the Court issues a decision on Plaintiffs' anticipated motion for class certification and the Campaign's anticipated motion for decertification of the FLSA collective. Because this is Plaintiffs' request (and not the Campaign's), we do not address it in this letter, but note that the Campaign would not oppose such a request if Plaintiffs were to make it.